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CONTOS & BUNCH
LAWYERS
5855 TOPANGA CANYON BOULEVARD
SUITE 400
WOODLAND HILLS, CALIFORNIA 91367
(213) 716-9400

Attorneys for Defendant GERALD ARMSTRONG

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY)	CASE NO: C 420 153
OF CALIFORNIA,)	
)	FIRST REQUEST FOR PRODUCTION
Plaintiff,)	OF DOCUMENTS
)	
vs.)	
)	
GERALD ARMSTRONG, et al.,)	
)	
Defendants.)	
)	

TO PLAINTIFF, CHURCH OF SCIENTOLOGY OF CALIFORNIA, AND
TO ITS ATTORNEYS OF RECORD HEREIN, GREY AND KOHLWECK:

PLEASE TAKE NOTICE that on September 7, 1982, at 10:00 a.m.,
Defendant, GERRY ARMSTRONG, requests that Plaintiff produce
for inspection and copying documents described herein pursuant
to California Code of Civil Procedure, Section 2016 and 2019,
at the offices of Contos & Bunch, 5855 Topanga Canyon Boulevard,
Suite 400, Woodland Hills, California, as follows:

1. Any and all original journals, memoranda, drafts,
notes, orders, letters, HCOB's, HCOPL's, any other form of
policy or technical directives or bulletins, photographs,

1 audio and video recordings of every kind, artifacts, memorabilia,
2 antique writings, and treatises, books, novels, and other pub-
3 lications of L. Ron Hubbard or Mary Sue Hubbard, or any other
4 material not above-described, but part of the Archives Project
5 of the Church of Scientology of California.

6 2. Any and all originals or copies of files, records,
7 memoranda, logs, notes, orders, audio and video recordings
8 of any kind, including transcripts of any audio and video
9 recordings, and any other documentation written material of
10 any kind dealing with the MCCS Mission (Legal Mission).

11 3. Any and all originals or copies of written contracts,
12 agreements, petitions, schedules, and any other documentation
13 or written communication of Plaintiff dealing with the biography
14 of L. Ron Hubbard.

15 4. Any and all originals or copies of written contracts,
16 agreements, petitions, schedules, and any other documentation
17 or written communication of Plaintiff to Omar V. Garrison
18 dealing with the biography of L. Ron Hubbard.

19 5. The original three page Petition dated January 8,
20 1980, to R. from Gerry Armstrong concerning a request to research
21 for L. Ron Hubbard's biography.

22 5. The original one page letter dated July 29, 1980,
23 from Pat Brice, personal secretary to L. Ron Hubbard, addressed,
24 TO WHOM IT MAY CONCERN.

25 6. The original eight page AGREEMENT dated October 30,
26 1980, between Omar V. Garrison and AOSH DK PUBLICATIONS.

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28 ///

1 7. Any and all originals or copies of written communi-
2 cations during the year 1980 to AOSH DK PUBLICATIONS and
3 Scientology Publications Organization in Copenhagen, Denmark,
4 dealing with the biography of L. Ron Hubbard.

5 8. Any and all originals or copies of schedules to
6 the AGREEMENT dated October 30, 1980, between Omar V. Garrison
7 and AOSH DK PUBLICATIONS.

8 9. Any and all originals or copies of Suppressive
9 Person Declares on Gerry Armstrong from the Sea Organization,
10 dated February 18, 1982.

11 10. Any and all originals or copies of files, records,
12 memoranda, logs, notes, orders, audio and video recordings of
13 any kind, including transcripts of any audio and video recordings
14 any other documentation or written material of any kind dealing
15 with the Committee of Evidence of Guardian Office members,
16 Flag Conditions Order No. 6439, dated October 8, 1981.

17 11. Any and all originals or copies of a Time Track and
18 Proposal prepared by Vaughn Young dealing with the biography of
19 L. Ron Hubbard.

20 12. Any and all original Guardian Office files, speci-
21 fically, B1 files; preclear files; personnel files; and ethics
22 files on Gerry Armstrong.

23 13. Any and all originals or copies of any appraisals
24 prepared by Virgil Wilhite of L. Ron Hubbard archival materials.

25 14. Any and all originals or copies of files, records,
26 memoranda, logs, notes, orders, written communication, and
27 any other documentation or written material of any kind con-
28 cerning Michael Flynn.


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15. Any and all originals or copies of files, records, memoranda, logs, notes, orders, written communications, and any other documentation or written material of any kind concerning L. Ron Hubbard, Jr., aka Ronald de Wulf.

16. Any and all originals or copies of files, records, memoranda, logs, notes, orders, written communications, and any other documentation or written material of any kind concerning Ford Schwartz.

DATED: August 6, 1982

CONTOS & BUNCH

By: 
JULIA DRAGOJEVIC
Attorneys for Defendant
GERALD ARMSTRONG

VERIFICATION BY PARTY (466, 2015.5 C. C. P.)

STATE OF CALIFORNIA, COUNTY OF

I am the _____

in the above entitled action or proceeding; I have read the foregoing _____

and know the contents thereof; and I certify that the same is true of my own knowledge, except as to those matters which are therein stated upon my information or belief, and as to those matters I believe it to be true.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on _____ at _____, California
(date) (place)

Signature

PROOF OF SERVICE BY MAIL (1013a, 2015.5 C. C. P.)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my business address is:

5855 Topanga Canyon Blvd., Ste. 400, Woodland Hills, CA 91367

On August 6, 1982, I served the within FIRST REQUEST FOR

PRODUCTION OF DOCUMENTS

on the interested parties in said action, by placing a true copy thereof enclosed in a sealed envelope with _____

at Woodland Hills, CA 91367 addressed as follows:

BY MESSENGER:
Carl Kohlweck, Esq.
GREY AND KOHLWECK
1821 Wilshire Boulevard
Suite 210
Santa Monica, CA 90403

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on August 6, 1982 at Woodland Hills, California
(date) (place)

Pamela Wickersham

Signature

PAMELA WICKERSHAM